

WILLIAM K. HARRINGTON
UNITED STATES TRUSTEE, REGION 2
U.S. Department of Justice
Office of the United States Trustee – NY Office
Alexander Hamilton Custom House
One Bowling Green, Room 534
New York, NY 10004
Tel. (212) 510-0500
By: Mark Bruh
Trial Attorney

Hearing Date: September 25, 2024
Hearing Time: 9:00 a.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
In re : Chapter 11
NEW TENT, LLC, *et al.*,¹ :
Debtors. : Case No. 24-10015 (JPM)
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**NOTICE OF THE UNITED STATES TRUSTEE'S MOTION
TO DISMISS THESE CASES, OR IN THE ALTERNATIVE, CONVERT
THESE CHAPTER 11 CASES TO CASES UNDER CHAPTER 7**

PLEASE TAKE NOTICE that upon this Notice of Motion and the accompanying memorandum of law, the United States Trustee for Region 2 (the “United States Trustee”), will move this Court before the Honorable John P. Mastando III, Bankruptcy Judge, in the United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, New York 10004 on **September 25, 2024 at 9:00 a.m.** (the “Hearing”), or as soon thereafter as counsel can be heard, for an order dismissing these Chapter 11 cases, or in the alternative,

¹ The Debtors in these chapter 11 cases and the last four digits of each debtor’s taxpayer identification number are as follows: New Tent, LLC (“New Tent”), Case No. 24-10015 (2583); and Neo Image Enterprises, LLC (“Neo”), Case No. 24-10016 (1022) (New Tent and Neo are collectively referred to as the “Debtors”).

converting these cases to cases under chapter 7, and for such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that the Hearing will be held via Zoom for Government. Participants are required to register their appearance by 4:00 p.m. the day before the Hearing by utilizing the Electronic Appearance portal located on the Court's website at <https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>.

PLEASE TAKE FURTHER NOTICE that any responsive papers should be filed with the Court and served on the United States Trustee via email, attention: Mark Bruh, Esq. (mark.bruh@usdoj.gov), no later than seven (7) days prior to the return date set forth above. Such papers shall conform to the Federal Rules of Civil Procedure and identify the party on whose behalf the papers are submitted, the nature of the response, and the basis for such response. Failure to provide this information may be grounds to strike the response or to grant the motion by default.

Dated: New York, New York
August 26, 2024

Respectfully submitted,

WILLIAM K. HARRINGTON
UNITED STATES TRUSTEE

By: /s/ Mark Bruh
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